



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Frank O'Bannon
Governor

Lori F. Kaplan
Commissioner

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.state.in.us/idem

December 19, 2000

Dear Environmental Contact:

RE: Rule 20-25, Indiana Styrene Rule

Due to poor weather conditions, the Styrene Workshop in Elkhart on December 12 was cancelled. It has been rescheduled for Tuesday, January 30, 2001. I am sending this letter to advise you of upcoming compliance deadlines for the Indiana Styrene Rule (326 IAC 20-25). If you are required to comply with Rule 20-25, you need to be aware of several quickly approaching deadlines (some as soon as March 1, 2001). These deadlines are outlined below.

This letter serves to remind you only of those deadlines that fall in the next few months. It does not include all the compliance deadlines for this rule or any other rule. If you have questions about how this rule applies to you or how to implement this rule at your facility, please refer to several helpful documents on the Department of Environmental Management (IDEM) web site at: www.state.in.us/idem/ctap/fiber/workshop.html. There you will find a calendar of compliance deadlines and a Question and Answer document for the styrene rule (including specific answers to questions on the work practice standards, operator training, and significant permit modifications). For confidential compliance assistance, you may also call Karen Teliha at (800) 988-7901.

To be subject to this rule, you must meet ALL of the following:

- ☐ Must have a potential to emit (PTE) of 10 tons per year of any one hazardous air pollutant (HAP) or 25 tons per year of any HAP (Basically means you are a Title V, Part 70 source)
- ☐ Manufacture reinforced plastics composites or watercraft.
- ☐ Use an open molding process.
- ☐ Have styrene emissions greater than or equal to 3 tons per year (actual emissions).

Upcoming Deadlines for the Indiana Styrene Rule

(for a complete list of deadlines for this rule, please refer to the web at: www.state.in.us/idem/ctap/fiber/workshop.html)

Work Practice Standards

By March 1, 2001, you must operate in accordance with the following work practice standards:

- ☐ Nonatomizing spray equipment shall not be operated at pressures that atomize the material during the application process.
- ☐ Except for mixing containers (those larger than 55 gallons), HAP containing materials shall be kept in a closed container when not in use (in use means used within minutes).
- ☐ Solvents sprayed during cleanup and resin changes shall be directed into solvent collection containers.

- ❑ Solvent collection containers shall be kept closed when not in use (in use means used within minutes).
- ❑ Clean-up rags with solvent shall be stored in closed containers.
- ❑ Closed containers shall be used for the storage of the following:
 - ❑ All production and tooling resins that contain HAPs.
 - ❑ All production and tooling gel coats that contain HAPs.
 - ❑ Waste resins and gel coats that contain HAPs.
 - ❑ Cleaning materials, including waste cleaning materials.
 - ❑ Other materials that contain HAPs.
- ❑ All resin and gel coat mixing containers with a capacity equal to or greater than 55 gallons must have a cover with no visible gaps at all times. The only exceptions are when material is being added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container.

Operator Training

For personnel hired before the effective date of this rule, you must train or evaluate personnel who are involved in resin and gel coat spraying and spray-like applications no later than 30 days after the effective date.

For personnel hired after the effective date of this rule, you must train personnel who are involved in resin and gel coat spraying and spray-like applications within 15 days of hiring.

The effective date of this rule is not yet known. It is expected to be in February, 2001. If this occurs, then personnel hired before the effective date must be trained or evaluated by March, 2001. If you evaluate an employee and this evaluation reveals training is needed, you must train the employee within 15 days of the evaluation.

The lesson plans shall cover at a minimum, all of the following topics:

- ❑ Appropriate application techniques.
- ❑ Appropriate equipment cleaning procedures.
- ❑ Appropriate equipment setup and adjustment to minimize material usage and overspray.

You must maintain the following training records on site and available for inspection:

- ❑ A copy of the current training program.
- ❑ A list of all current personnel, by name, that are required to be trained and the dates they were trained and the date of the most recent refresher training.

The Indiana Clean Manufacturing Technology and Safe Materials Institute (CMTI) is investigating with others, how to provide training services to help the fiber reinforced plastics sector comply with this regulation. Questions about this service can be addressed by calling CMTI at (765) 463-4749.

Using Averaging or Alternative Emission Reduction Standards

The Indiana Styrene Rule sets emission standards for several processes. These standards are in the rule as two tables (Table I and Table II). Table I applies to fiber reinforced plastics composites products EXCEPT watercraft and contains 12 categories. Table II applies to watercraft products and contains 7 categories. If you are considering averaging between categories or if you are considering using an alternative emission reduction technique, you must obtain IDEM approval before January 1, 2002. (Note: Averaging within any category does not require IDEM approval.)

In order to receive IDEM approval, you must apply for a significant permit modification. A significant permit modification is required because 326 IAC 2-7-12(b)(1)(C)(i) does not allow the approval of either

alternative (averaging or alternative techniques) to occur with a minor permit modification. IDEM, Office of Air Quality has nine (9) months (270 days) to review and issue significant permit modification requests. You should provide sufficient information in the application to allow IDEM, OAQ to evaluate the proposed alternative. You cannot implement a significant modification request until a significant permit modification is issued. Therefore, you must plan in advance if you want to use the averaging provisions or request an alternative operating scenario.

If you are planning on averaging between categories or using an alternative emission reduction technique, you must have your significant permit modification in place prior to the January 1, 2002 deadline. This means you need to apply for the modification no later than March 31, 2001. It is highly recommended that you apply as soon as possible in case the information you provide is not sufficient.

If you need to make physical modifications to implement the alternative request, some level of source modification approval in accordance with 326 IAC 2-7-10.5 may be necessary. You can apply for the source modification at the same time it requests the permit modification.

To apply for a significant permit modification, you should use the Title V application forms and complete those forms that address areas that will be affected by the modification. These forms are available on the web at: www.state.in.us/idem/oam/permits/apps/index.html.

Again, the Styrene/Title V Workshop that was cancelled on December 12, 2000 has been rescheduled for January 30, 2001. The workshop will address many more questions about the Styrene Rule. If you would like to attend, please call Alice Smith at (765) 463-4749 to register. For confidential compliance assistance, you may also call Karen Teliha at (800) 988-7901.

Sincerely,

Jim Mahern
Assistant Commissioner
Office of Pollution Prevention &
Technical Assistance